



May 12, 2023

Barbara Neal
Executive Director
Vermont Enhanced 9-1-1 Board
100 State St., 4th Floor
Montpelier, VT 05620-6501

Dear Executive Director Neal and the Board:

Per Director Neal's March 28, 2023 email, CTIA offers the following feedback in response to the revised proposed amendments to the Vermont Enhanced 9-1-1 Board's (the "Board's") rules regarding outage reporting (the "Proposed Rules").

CTIA appreciates the continued work by the Board to gather stakeholder feedback and improve the Board's rules on outage reporting. The edits made in the revised Proposed Rules regarding follow-up notifications (Section 4.6) represent a good start towards increasing efficiency in restoration by minimizing the filing burden on carriers while maintaining situational awareness for the Board about outages.

The revised Proposed Rules provide limited insight regarding the format of information that carriers will submit to the new automated system, though the Board includes an annotation noting that it "intends to work collaboratively with industry on format changes." CTIA looks forward to engaging with the Board to develop a format that prioritizes restoration efficiency while meeting the Board's expectations for situational awareness.

CTIA also appreciates the addition of an implementation period for the Proposed Rules (Section 8.1) that, as CTIA explained in informal comments, will give time for impacted providers to implement the necessary changes to their reporting systems and adjust to the new automated system. In informal comments, multiple parties,



including CTIA, suggested the Board also include an implementation period for any changes to the reporting format as well. In the most recent draft of the Proposed Rules, the Board responded in annotations that Section 8.2 is intended to address this issue by allowing a six-month implementation period for “updates to this rule”. CTIA supports the inclusion of Section 8.2 for the same reason as Section 8: An appropriate implementation period for carriers to respond to rule changes is wise. However, to the extent that Section 8.2 is intended to provide implementation time for changes to the reporting format or the data requested therein, as currently written, it would not achieve that purpose. The Proposed Rules do not codify the format of the reports, and Section 6.1 of the Proposed Rules (Report Format) only requires rule changes to be communicated to industry and posted on the Board’s website, not codified – *i.e.*, format changes could happen without a corresponding rule change, failing to trigger Section 8.2’s implementation period.

To rectify this issue, CTIA recommends the Board add a corresponding Section 8.3 to the Proposed Rules, mirroring the language of Sections 8.1 and 8.2, that would read:

8.3 Changes to the format of reports will become effective as soon as originating carriers and electric power companies are technically capable of complying but no later than six months after the format changes have been communicated pursuant to section 6.1.



CTIA looks forward to continued engagement with the Board as it further refines the Proposed Rules.

Sincerely,

_____/s/

Matthew DeTura

Matthew DeTura

Counsel, External and State Affairs

CTIA – The Wireless Association®

MDeTura@ctia.org

(202) 736-3228